

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF OKLAHOMA**

IN RE:

WHITE STAR PETROLEUM HOLDINGS, LLC
DEBTOR

CASE NO. 19-12521-JDL
CHAPTER 11

BAKER HUGHES OILFIELD OPERATIONS, LLC,
et al.

PLAINTIFFS

ADV NO. 19-01097-JDL

v.

WHITE STAR PETROLEUM, LLC, et al.
DEFENDANT(S)

ANSWER IN ADVERSARY PROCEEDING

COMES NOW Pump Down Solutions, LLC, an Oklahoma limited liability company, (hereinafter referred to as “Defendant PDS”) and for its Answer to Baker Hughes Oilfield Operations, LLC and MS Directional, LLC’s (hereinafter collectively referred to as “Plaintiffs” unless otherwise designated) First Amended Complaint in the above styled Adversary Proceeding (hereinafter referred to as “Complaint”) states as follows:

1. Defendant PDS is without sufficient information to admit or deny paragraphs one through thirty one (1-31) of Plaintiffs’ Complaint therefore same are denied and strict proof thereof demanded.
2. Defendant PDS admits paragraph thirty two (32) of Plaintiffs’ Complaint.
3. Defendant PDS is without sufficient information to admit or deny paragraphs one thirty three through fifty one (33-51) of Plaintiffs’ Complaint therefore same are denied and strict proof thereof demanded.
4. Defendant PDS admits paragraphs fifty two (52) of Plaintiffs’ Complaint.
5. Defendant PDS is without sufficient information to admit or deny paragraph fifty three (53) of Plaintiffs’ Complaint.

6. Defendant PDS admits paragraph fifty four (54) of Plaintiffs' Complaint.

7. Defendant PDS is without sufficient information to admit or deny paragraphs fifty five through fifty eight (55-58) of Plaintiff's Complaint therefore same are denied and strict proof thereof demanded.

8. Defendant PDS admits paragraphs fifty nine through sixty two (59-62) of Plaintiff's Complaint.

9. Defendant PDS incorporates its answers in paragraphs one through eight (1-8) in response to paragraph sixty three (63) and fully restates same in response to Count I of Plaintiffs' Complaint.

10. Defendant PDS admits paragraph sixty four (64).

11. Defendant PDS is without sufficient information to admit or deny paragraphs sixty five through sixty nine (65-69) of Plaintiffs' Complaint therefore same are denied and strict proof thereof demanded.

12. Defendant admits paragraph seventy (70) of Plaintiffs' Complaint.

13. Defendant PDS incorporates its answers in paragraphs one through twelve (1-12) in response to paragraph seventy one (71) and fully restates same in response to Count I of Plaintiffs' Complaint.

14. Defendant PDS admits paragraph seventy two (72) of Plaintiffs' Complaint.

15. Defendant PDS denies paragraph seventy three through seventy five (73-75) of Plaintiffs' Complaint and demands strict proof thereof.

16. Count 3 of Plaintiffs' Complaint is directed to White Star Petroleum only and does not require a response from Defendant PDS. To the extent a response is required Defendant PDS is without sufficient information to admit or deny paragraphs seventy six through eighty (76-80) of Plaintiffs' Complaint therefore same are denied and strict proof thereof demanded.

17. Count 4 of Plaintiffs' Complaint is directed to Defendants Templar and Chaparral only and does not require a response from Defendant PDS. To the extent a response is required Defendant PDS is without sufficient information to admit or deny paragraphs eighty one through eighty four (81-84) of Plaintiffs' Complaint therefore same are denied and strict proof thereof demanded.

18. Count 5 of Plaintiffs' Complaint is directed to Defendant Phillip 66 only and does not require a response from Defendant PDS. To the extent a response is required Defendant PDS is without sufficient information to admit or deny paragraphs eighty five through eighty eight (85-88) of Plaintiffs' Complaint therefore same are denied and strict proof thereof demanded.

19. Defendant PDS is without sufficient information to admit or deny paragraphs eighty nine and ninety (89-90) of Plaintiffs' Complaint therefore same are denied and strict proof thereof demanded.

AFFIRMATIVE DEFENSES

1. Defendant PDS has secured oil and gas well liens which are evidenced by the Proof of Claims filed in this bankruptcy litigation.

2. Defendant PDS secured oil and gas well liens are superior to those of the co-Defendants named in this litigation.

3. Defendant PDS' secured liens and claims are valid and should be ranked accordingly and placed in line for payment.

4. Defendant PDS hereby reserves the right to amend its answer and/or to supplement its affirmative defenses.

WHEREFORE, Defendant Pump Down Solutions, LLC having fully answered the Plaintiffs' First Amended Complaint hereby requests the Court enter an Order finding Defendant PDS' Proof of Claim filed in case number 19-12521-JDL and related cases are superior to the liens of the co-Defendants named herein, that those liens be ranked according to priority and placed in line for

payment, that Pump Down Solutions' be awarded its' attorney fees and costs incurred herein together with any other relief this Court deems equitable.

Respectfully submitted,

s/Shawn D. Fulkerson

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CERTIFICATE OF SERVICE

This is to certify that on this 10th day of October, 2019 I electronically transmitted the foregoing document to the Clerk of the Court using the ECF system for filing and transmittal of the Notice of Electronic Filing to the following ECF registrants:

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s/Shawn D. Fulkerson